

IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF WASHINGTON  
Civil Law Department

In the Matter of:

Alexander Daniloff,

Plaintiff,

v.

Google, LLC.,

Michael Keown,

Defendants.

22CV24089

Case No.

COMPLAINT FOR RECOVERY OF  
PLAINTIFF'S DAMAGES DUE TO  
PUBLICATION OF DEFAMATORY  
STATEMENT BY DEFENDANTS ON  
INTERNET  
(\$300,000.00)

Fee per ORS 21.160 (1) (c)

Plaintiff, Alexander Daniloff, attorney at law and founder of Daniloff Law Firm, brings this action to recover Plaintiff's financial and reputational damages due to the publication and facilitation of defamatory statements by Defendants on the Internet, and to demand a jury trial, based on the Plaintiff's allegations in support of this Complaint as follows:

1.

The Court has jurisdiction over this proceeding and parties pursuant to ORS 14.030, venue is proper pursuant to ORS 14.080 and to the extent required, Plaintiff consents to final jurisdiction of this Court.

2.

Plaintiff is an attorney at law and founder of Daniloff Law Firm with principal place of business located at 3875 SW Hall Blvd., Suite A, Beaverton, OR 97005 in Washington County.

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DANILOFF LAW FIRM  
3875 SW Hall Blvd., Suite A, Beaverton, OR 97005  
Phone: (503) 867-9113 ▪ Email: alex@danilofflaw.com ▪ Fax: (888) 469-8818

3.

Google, LLC. (First Defendant) is registered in Delaware and has principal place of business located at 1600 Amphitheatre Parkway, Mountain View, CA 94043.

4.

Michael Keown (Second Defendant) is an individual and his last known location is at 2157 Pin Oak Drive, Owensboro, KY 42303.

5.

On Monday, May 30, 2022, Plaintiff received an email from Google, LLC. (First Defendant), that Michael Keown (Second Defendant) left a one star review in Plaintiff's Google Business Profile.

6.

Plaintiff alleges that published one star review by Second Defendant in Plaintiff's Google Business Profile contained defamatory statements about Plaintiff's character and his professional reputation as an attorney.

7.

Plaintiff alleges that the defamatory review, published by Second Defendant, contained false information about Plaintiff, his conduct of business and Plaintiff was undeservedly called by offensive names.

8.

Plaintiff alleges that he has never been in an attorney-client relationship with Second Defendant and Plaintiff has never provided any legal services and/or advices to Second Defendant.

9.

On Monday, May 30, 2022, Plaintiff posted his rebuttal to said defamatory statements and submitted his first electronic request to First

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Exhibit A  
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1 Defendant for the removal of said defamatory review published by Second  
2 Defendant.

3 10.

4 Second Defendant, in response to Plaintiff's rebuttal, posted additional  
5 defamatory statements about Plaintiff and challenged Plaintiff to bring a law  
6 suit against Second Defendant.

7 11.

8 On Monday, June 6, 2022, Plaintiff received an email from First  
9 Defendant denying his request for removal of the defamatory review by Second  
10 Defendant, for allegedly not finding a violation of the First Defendant's  
11 policies.

12 12.

13 On Monday, June 6, 2022, Plaintiff submitted his second electronic  
14 request to First Defendant for the removal of said defamatory review published  
15 by Second Defendant.

16 13.

17 On Monday, June 20, 2022, Plaintiff sent a formal demand letter to First  
18 Defendant by first class certified mail with return receipt, where he demanded  
19 to immediately remove Second Defendant's libelous and false review and to  
20 provide Second Defendant's contact information.

21 14.

22 On Monday, June 27, 2022, Plaintiff's formal demand letter was delivered  
23 to First Defendant.

24 15.

25 On Wednesday, June 29, 2022, at approximately 8:25 a.m., Plaintiff  
26 received an email from First Defendant responsive to his formal demand letter  
27 with a digital mail receipt, where First Defendant requested a court order and  
28

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Exhibit A  
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1 additional information to consider the removal of Second Defendant's  
2 defamatory review, and provided a link to report a legal removal issue.

3 16.

4 On Wednesday, June 29, 2022, at approximately 12:27 p.m., Plaintiff  
5 submitted electronic request for removal to First Defendant, based on the  
6 legal issues.

7 17.

8 On Wednesday, June 29, 2022, at approximately 12:32 p.m., Plaintiff  
9 received an email from First Defendant in response to Plaintiff's second  
10 electronic request for removal, where First Defendant claimed its inability to  
11 remove content from third-party web pages and suggested contacting the author  
12 or webmaster.

13 18.

14 Plaintiff alleges that he conducted a thorough research regarding the  
15 site where Second Defendant has published his defamatory review.

16 19.

17 Plaintiff alleges that Second Defendant's defamatory review was  
18 published on a web server in public domain controlled and/or maintained by  
19 First Defendant.

20 20.

21 Plaintiff alleges that Defendants have acted with a reckless and  
22 outrageous indifference to a highly unreasonable risk of reputational and  
23 financial harm to Plaintiff.

24 21.

25 Plaintiff alleges that Defendants have acted with a conscious  
26 indifference to the Plaintiff's existing and potential client's welfare, their  
27 legal needs and safety.

28 **Page 4 of 7 – COMPLAINT FOR RECOVERY OF PLAINTIFF'S DAMAGES DUE TO PUBLICATION OF  
DEFAMATORY STATEMENT BY DEFENDANTS ON INTERNET**

1 22.

2 Plaintiff alleges that Defendants, as publishers of the defamatory  
3 review, have acted with a reckless and outrageous indifference and disregard  
4 whether said defamatory statements were true or false, and refused to remove  
5 them after multiple Plaintiff's requests.

6 23.

7 Plaintiff alleges that the defamatory review created and published by  
8 Defendants, implies the existence of undisclosed defamatory facts, and such  
9 conduct is actionable against Defendants.

10 24.

11 Plaintiff alleges that Second Defendant's statements are defamatory  
12 because they are false and ascribe to another conduct, characteristics, or a  
13 condition incompatible with the proper conduct of an attorney engaged in the  
14 practice of law.

15 25.

16 Plaintiff alleges that Second Defendant is falsely alleging facts that  
17 are likely to lead ordinary people and Plaintiff's potential clients to  
18 question Plaintiff's fitness to perform his job as an attorney at law, and  
19 such conduct is defamatory per se and therefore gives rise to presumptive  
20 special harm to Plaintiff.

21 26.

22 Plaintiff alleges that Second Defendant cannot represent legally or  
23 otherwise any individuals, including any former Plaintiff's clients, and act  
24 on their behalf without proper authorization and/or license to practice law.

25 27.

26 Plaintiff alleges that Defendants were never privy to any Plaintiff's  
27 client-lawyer privileged communications, his communications with other  
28

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attorneys, and that Defendants were never privy to any work product created by Plaintiff on behalf of his clients.

28.

Plaintiff alleges that Defendants do not have any sufficient facts to defend libelous and defamatory statements made about Plaintiff on the Internet in public domain.

29.

Plaintiff alleges that as a result of defamatory statements, published by Second Defendant on Monday, May 30, 2022 and still prominently displayed in Plaintiff's Google Business Profile hosted by First Defendant, Plaintiff suffers substantially decreased number of potential clients and associated with this financial losses, currently estimated in the amount of \$200,000.00.

30.

Plaintiff alleges that as a result of defamatory statements, published by Second Defendant on Monday, May 30, 2022 and still prominently displayed in Plaintiff's Google Business Profile hosted by First Defendant, Plaintiff suffers non-economic reputational damages, currently estimated in the amount of \$100,000.00.

WHEREFORE, Plaintiff prays for a judgment as follows:

1. Finding that Defendants and/or their employees published and/or facilitated defamatory statements about Petitioner on the Internet in public domain;
2. Finding that Defendants' conduct is defamatory per se and therefore gives rise to presumptive special harm to Plaintiff;
3. Finding that as a result of these defamatory statements, Plaintiff has suffered direct and consequential reputational and financial damages;

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4. Ordering a complete removal of all published by Second Defendant defamatory statements and/or reviews about Plaintiff from his Google Business Profile and any other public sites, accounts and profiles controlled and/or owned by Second Defendant;
5. Ordering Second Defendant to issue and publish a public apology to Plaintiff in all public profiles and accounts on the Internet controlled and/or owned by Second Defendant;
6. Awarding economic damages to Plaintiff in the amount of \$200,000.00;
7. Awarding non-economic reputational damages to Plaintiff in the amount of \$100,000.00;
8. Awarding punitive damages to Plaintiff, pursuant to ORS 31.730, as the court deems just and proper;
9. Awarding Plaintiff his attorney fees and costs incurred herein; and
10. Granting any such other and further relief as the court deems just and proper.

DATED this 21st day of July, 2022.



/s/ Alexander Daniloff  
Alexander Daniloff, OSB #183278  
Attorney for Plaintiff

**RETURN OF SERVICE**

**State of Oregon**

**County of WASHINGTON**

**CIRCUIT Court**

**Case Number: 22CV24089**

**Plaintiff:  
ALEXANDER DANILOFF**

**vs.**

**Defendant:  
GOOGLE LLC., and MICHAEL KEOWN**

**Received by Oregon Evictions and Process Service, LLC on the 22nd day of July, 2022 at 4:17 pm to be served on  
GOOGLE LLC. c/o CORPORATION SERVICE COMPANY, REGISTERED AGENT, 1127 BROADWAY STREET NE,  
SUITE 310, SALEM, OR 97301.**

**I, Julie Field, do hereby affirm that on the 26th day of July, 2022 at 11:33 am, I:**

**Served GOOGLE LLC. c/o CORPORATION SERVICE COMPANY, REGISTERED AGENT pursuant to ORCP 7D(3)(b)(i)  
by delivering a true copy of the SUMMONS AND COMPLAINT to AUDREY GROOM, AUTHORIZED CLERK, person in  
charge of the office who is authorized to accept service at 1127 BROADWAY STREET NE, SUITE 310, SALEM, OR  
97301.**

**I certify that I was and now am a competent person, over the age of 18 years, and a resident of the State of Oregon or the  
state of service. I am not a party to nor an officer, director or employee of, nor attorney for any party, corporate or otherwise  
and I know that the person, firm or corporation served is the identical one named in the action.**

**I also certify that the above statement is true to the best of my knowledge and belief, and that I understand it is made for  
use as evidence in court and is subject to penalty for perjury.**

  
**Julie Field  
Process Server**

**Date**  
7/29/22

**Oregon Evictions and Process Service, LLC  
17040 Pilkington Rd., Ste 200  
Lake Oswego, OR 97035  
(503) 912-4916**

**Our Job Serial Number: PAT-2022001082**



IN THE CIRCUIT COURT OF THE STATE OF OREGON

FOR THE COUNTY OF WASHINGTON

Civil Law Department

In the Mater of:

Alexander Daniloff,

Plaintiff,

v.

Google, LLC.,

Michael Keown,

Defendants.

Case No. 22CV24089

SUMMONS

TO: Corporation Service Company, Registered Agent for Google, LLC.,  
Defendant, at 1127 Broadway St. NE Ste. 310, Salem, OR 97301.

YOU ARE HEREBY REQUIRED to appear and defend Plaintiff's COMPLAINT FOR  
RECOVERY OF PLAINTIFF'S DAMAGES DUE TO PUBLICATION OF DEFAMATORY STATEMENT BY  
DEFENDANTS ON INTERNET filed against you in the above-entitled cause within  
thirty (30) days from the date of service of this summons upon you, and in  
case of your failure to do so, for want thereof, Plaintiff will apply to the  
court for relief demanded in the above referenced complaint.

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1 NOTICE TO THE RESPONDENT/DEFENDANT: READ THESE PAPERS CAREFULLY!

2 You must "appear" in this case or the other side will win automatically.  
3 To "appear" you must file with the court a legal paper called a "motion" or  
4 "answer". The "motion" or "answer" must be given to the court clerk or  
5 administrator within 30 days along with the required filing fee. It must be  
6 in proper form and have proof of service on the Plaintiff's attorney or, if  
7 the Plaintiff does not have an attorney, proof of service upon the Plaintiff.  
8 If you have any questions, you should see an attorney immediately. If you  
9 need help in finding an attorney, you may call the Oregon State Bar's Lawyer  
10 Referral Service at (503) 684-3763 or toll-free in Oregon at (800) 452-7636.

11 DATED July 21, 2022.

12 

13  
14 /s/ Alexander Daniloff  
15 Alexander Daniloff, OSB #183278  
16 Attorney for Plaintiff  
17

18 I, the undersigned attorney of record for Plaintiff, certify that the  
19 foregoing is an exact and complete copy of the original Summons in the above-  
20 entitled cause.

21  
22 

23  
24 /s/ Alexander Daniloff  
25 Alexander Daniloff, OSB #183278  
26 Attorney for Plaintiff  
27  
28

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